

March 31, 2025

**BY ECF**

Honorable Richard M. Berman  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: *United States v. Keonne Rodriguez, et al., 24 Cr. 82 (RMB)***

Dear Judge Berman:

We write on behalf of the parties in the above-referenced matter. During the last conference on May 18, 2025, the Court set a briefing schedule for pre-trial motions. The parties have now agreed to a slightly modified schedule, which we have submitted below for the Court's consideration:

- May 13, 2025: Defense motions
- May 20, 2025: Amicus briefs in support of defense motions
- June 10, 2025: Government responses
- June 24, 2025: Defense replies

Respectfully submitted,

Michael Kim Krouse

cc: AUSA Andrew Chan  
AUSA David Felton  
AUSA Cecilia Vogel